

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LYNNE FREEMAN, an individual,

Plaintiff,

-against-

Case No. 1:22-cv-2435

TRACY DEEBE-ELKENANEY P/K/A TRACY  
WOLFF, an individual, EMILY SYLVAN KIM, an  
individual, PROSPECT AGENCY, LLC, a New  
Jersey limited liability company, ENTANGLED  
PUBLISHING, LLC, a Delaware limited liability  
company, MACMILLAN PUBLISHERS, LLC, a  
New York limited liability company, UNIVERSAL  
CITY STUDIOS, LLC, a Delaware limited liability  
company

**AFFIDAVIT IN SUPPORT  
OF MOTION TO ADMIT  
COUNSEL  
*PRO HAC VICE***

Defendants.


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I, Mark D. Passin, being duly sworn, hereby depose and say as follows:

1. I am an attorney licensed to practice law in the state of California and am "of counsel" to the law firm of CSReeder, PC.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the state of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have not been convicted of a felony.
6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.
7. My Attorney Registration number is 101195.

8. Wherefore, your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned matter for Plaintiff, Lynne Freeman.

Executed on this 23 day of March 2022



Mark D. Passin, Esq.  
CSReeder, PC  
11766 Wilshire Boulevard, Suite  
1470  
Los Angeles, CA 90025  
(310) 861-2475  
mark@csrlawyers.com

Sworn to me this  
23 day of March, 2022

**PLEASE SEE CALIFORNIA**  
Notary **NOTARY CERTIFICATE**



**The State Bar  
of California**

180 Howard Street, San Francisco, CA 94105

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## CERTIFICATE OF STANDING

March 14, 2022

TO WHOM IT MAY CONCERN;

This is to certify that according to the records of the State Bar, MARK D. PASSIN, #101195 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 1981 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Alex Calderon".

Alex Calderon  
Custodian of Records

